

June 29, 1998

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Office of the Secretary (1800)

Room 222 - FCC

1919 M St. NW

Washington, DC 20554

Dear Sirs:

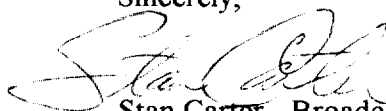
This letter is in reference to RM-9242, a Petition for Rulemaking submitted by Mr. J. Rodger Skinner of TRA Communications Consultants, Inc. Regarding the creation of new classes of LPFM services. As a practicing broadcast engineer for the past 10 years, I have seen the effects of consolidation and group ownership on broadcast stations, and have to agree with Mr. Skinner that there has certainly been a continuing trend away from "localism" in the radio broadcast industry.

After reviewing RM-9242, I believe that Mr. Skinner has come up with a workable plan for creation of LPFM services that would be extremely beneficial to the local communities that they would serve. My initial concerns about technical standards and what process would be used to determine awarding of CP's and/or LPFM licenses were dispelled after reading Mr. Skinner's petition thoroughly. This petition appears to answer a need for localized programming on the FM band, while creating a minimum of interference to the existing band. Any additional workload for the Commission regarding processing of applications will be minimized by Mr. Skinner's plan to award any mutually exclusive applications by use of the lottery system.

While there may be some minor issues that may need to be resolved, I am in agreement that RM-9242 should be given serious consideration as soon as possible. I myself would certainly welcome the opportunity to own and operate one of the proposed LPFM facilities, if the Commission acts favorably on RM-9242.

I would urge the Commission to approve this proposal and allow RM-9242 to become a reality, so that legal low power operation in the FM band would be possible for those who have been unable to do so until now. Localized service to communities on the FM band would be something I would like to see more of, and RM-9242 would certainly provide that above all other things.

Sincerely,



Stan Carter - Broadcast Engineering

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